BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL PATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES

Docket No. R2000-1

Major Mailers Association's Additional Follow Up Interrogatories And Requests For Production Of Documents To The United States Postal Service

Pursuant to Rules 25, 26, and 27 of the Commission's Rules of Practice, Major Mailers Association herewith submits the following follow up interrogatories and document production requests to the United States Postal Service: MMA/USPS-3.

Respectfully submitted,

Major Mailers Association

By:

Michael W. Hall 34693 Bloomfield Road Round Hill, Virginia 20141

540-554-8880 Counsel for

Major Mailers Association

Dated: Round Hill, VA April 27, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing discovery request upon the United States Postal Service, Ted P. Gerarden, the Designated Officer of the Commission, and participants who requested service of all discovery documents, in compliance with Rules 12, 26, and 27 of the Commission's Rules of Practice.

Dated this 28th day of April 2000

Michael W. Hall

MMA/USPS-3 Please refer to the untimely institutional responses to Interrogatory MMANSPS-T32-2-3, redirected from USPS witness Virginia J. Mayes. Please explain how total costs for the test year on a before rates and after rates basis can be different if computed using the Postal Service's methodology for attributing costs rather than the Commission's methodology for attributing costs? In the event that they should be identical, please show that this is so by filling in the table below.

<u>USPS Method</u> TYAR TYBR <u>PRC Method</u> TYAR TYBR

Volume Variable Costs Other Costs Total Costs